

BEYS LISTON & MOBARGHA LLP

Joshua D. Liston  
646.755.3601 (Direct)  
jliston@blmlp.com

December 12, 2016

**BY ECF**

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Kaleil Isaza Tuzman*, S7 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We write to advise the Court that, in reliance on an agreement reached today with the Government, Defendant Kaleil Isaza Tuzman withdraws as moot all but one part of his motion to compel production of Rule 16, *Brady*, *Giglio*, and Jencks Act material (the "Motion") (Dkt. 132). The part of the Motion regarding the Maiden computers and privilege waiver is not moot, and pursuant to the Court's order, the parties will jointly submit an update by December 16, 2016. (Dkt. 187.)

**MEMO ENDORSEMENT**

*Defendant's motion (Dkt. No. 132) is withdrawn as moot to the extent referred in this letter*

**SO ORDERED:**

*Paul G. Gardephe*  
**Paul G. Gardephe, U.S.D.J.**

*Dec. 15, 2016*

Respectfully Submitted,

/s Joshua D. Liston

Michael P. Beys, Esq.  
Joshua D. Liston, Esq.  
*Counsel for Kaleil Isaza Tuzman*

